

\*\*\* Filed \*\*\*  
04:52 AM, 16 Jul, 2025  
U.S.D.C., Eastern District of New York

**Hon. James R. Cho**

United States Magistrate Judge  
Eastern District of New York

**Re: IME Watchdog, Inc. v. Gelardi, No. 1:22-cv-01032 (PKC) (JRC)**  
**Clarification and Correction Regarding Prior Letter**

Dear Judge Cho,

Defendants respectfully submit this letter to correct an error in our July 16, 2025, letter regarding Plaintiffs' failure to oppose our motion.

In that letter, we inadvertently referenced ECF No. 526, which was filed on July 1, 2025. However, our intention was to address our **Motion to Compel Discovery**, which was filed on **July 7, 2025**, and is docketed at **ECF No. 543**.

We also recognize that, in referencing the Motion to Compel, we mistakenly stated that Plaintiffs' time to oppose had expired. We now acknowledge that their deadline to respond has not yet passed.

We respectfully submit this clarification to ensure the record is accurate and complete.

Respectfully submitted,

Safa Gelardi

July 16, 2025